

## HINSON SNIPES

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April 30, 2025

### VIA CM/ECF ONLY

Honorable Jose R. Almonte, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, NJ 07101

**RE:** Louis v. State of New Jersey, *et al.*  
Civil Action No: 2:22-cv-04490  
**Joint Status Letter**

Judge Almonte:

This office represents the plaintiff, James Louis, and writes to provide this joint-status letter on behalf of all parties to this litigation.

The parties worked diligently to reschedule the depositions. However, due to multiple scheduling conflicts, the following dates are the only dates all counsel are available and the depositions are scheduled to take place as follows:

Ann Rubin	-	May 20, 2025
Det. Koczur	-	May 27, 2025
Lt. Johnson	-	May 13, 2025
Corporate Designee	-	Tentatively May 28, 2025

To that end, the parties request that the Court extend the fact discovery end date to June 30, 2025, so that the remaining discovery can be completed. The parties agree an extension is necessary and will keep the Court apprised of any difficulty in scheduling the remaining depositions.

Respectfully submitted,  
HINSON SNIPES, LLP

By: \_\_\_\_\_  
Tracey C. Hinson, Esquire

cc: Counsel via E-file